

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JAMES EVERETT SHELTON,

Plaintiff,

-v-

NEW YORK TRIBECA GROUP LLC.

Defendant.

Civil Action No. 2:22-cv-04651-JDW

STIPULATION STAYING LITIGATION

Pursuant to Local Rule 7.4, Plaintiff, James Everett Shelton (“Plaintiff”) and Defendant, New York Tribeca Group, LLC (“Defendant”), hereby stipulate to a stay in the litigation following an agreement in principal to resolve the claims raised by Plaintiff’s Complaint. In support of the stipulation, the parties state as follows:

1. On or about December 2, 2022, Plaintiff filed his Complaint. (DE #1).
2. Following the filing of the Complaint, the parties reached a settlement in principal and executed a release agreement memorializing the settlement.
3. The settlement calls for a structured payout over the course of 2023.
4. Accordingly, the parties wish to stay the litigation to allow for consummation of the settlement. In the unlikely event that the settlement breaks down, the parties will be able to commence litigation as necessary.
5. The parties anticipate filing a joint stipulation of dismissal following the final payment of the structured payout, which is scheduled for October 30, 2023.

WHEREFORE, the parties respectfully request that this Court endorse the parties' stipulation staying the litigation pending settlement, along with such other relief as this Court deems proper.

Respectfully submitted,

NEW YORK TRIBECA GROUP, LLC

/s/ James Everett Shelton

JAMES EVERETT SHELTON

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Plaintiff, Pro Se

BY: /s/ Christopher C. Negrete

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Attorney for Defendant,

New York Tribeca Group, LLC

APPROVED BY THE COURT:

Date: _____

JOSHUA D. WOLSON, U.S.D.J.

CERTIFICATE OF SERVICE

I, Christopher C. Negrete, certify that on this 27th day of February 2023, I served the foregoing
Stipulation Staying Litigation on the following via email:

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CHRISTOPHER C. NEGRETE